

Dear Commissioners,

These comments are IN FAVOR of Rule Making Petition RM-10352.

As an active user of the 160M amateur band, I wish to express my support for the proposed separation of narrow and wideband modes at 1843 kHz. Speaking as a narrowband, weak signal user, I have personally experienced intolerable interference from wideband operations on many occasions. As a wideband user of the 160M allocation, I have always found that sufficient spectrum is available above 1843 for these operations. In fact, it has been my experience that the spectrum above 1900 is sparsely occupied.

The proposed rulemaking should be ADOPTED for the following reasons:

1. The proposal is consistent with all other FCC-mandated HF bandplans. This rulemaking will correct a band-planning deficiency.
2. The cost to implement this change is minimal. If the time and cost of the rulemaking process is too great to stand alone, it should be combined with other pending rulemaking, such as the "Novice Band Refarming" proposals.
3. Setting aside allocations for narrowband modes is consistent with objectives of increased efficiency in spectrum usage, and development of new, and more spectrum efficient communication modes.
4. Mandatory separation of narrow and wideband operations will reduce the burden and cost of enforcement activity because it will virtually eliminate the difficult and contentious situations that frequently arise when wide and narrow modes are permitted to operate in the same space. Such situations frequently occur in the 40 meter allocations due to inconsistencies in the worldwide 40 meter bandplan.
5. The proposal is entirely consistent with the bandplan adopted by the ARRL.

Please consider these comments, and I urge you to move forward with this petition and ADOPT it to benefit the US and worldwide Amateur community.

Respectfully submitted,

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Licensed and active since 1972  
Amateur Extra Class Licensee since 1975  
ARRL Member